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26 NATIONAL FOOTBALL LEAGUE,
27 NFL PROPERTIES LLC

28 (Additional counsel listed on next page)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

MDL No. 2323
Master Case No. 12-md-2323
Individual Case No. 2:12-cv-05435

Hon. Anita B. Brody

THIS DOCUMENT RELATES TO:
JOHNNIE MORTON, ET AL. V.
NATIONAL FOOTBALL LEAGUE, ET
AL.

**STIPULATION TO AMEND
COMPLAINT**

[TITLE OF PLEADING]

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Attorneys for Defendants
RIDDELL, INC.; ALL AMERICAN
SPORTS CORPORATION;
RIDDELL SPORTS GROUP, INC.;
EASTON-BELL SPORTS, INC.;
EASTON-BELL SPORTS, LLC; EB
SPORTS CORP.; RBG HOLDINGS
CORP.

1 This Stipulation is made by and between Plaintiffs and Defendants, by and
2 through their counsel of record, with reference to the following facts:

3 WHEREAS, Plaintiffs filed their Complaint in the Superior Court of the State
4 of California, Los Angeles County, on May 21, 2012;

5 WHEREAS, the United States District Court for the Eastern District of
6 Pennsylvania issued a Conditional Transfer Order on July 2, 2012 to transfer the case
7 to the Eastern District of Pennsylvania pursuant to Rule 7.1 of the Rules of Procedure
8 of the United States Judicial Panel on Multidistrict Litigation;

9 WHEREAS, the Conditional Transfer Order was finalized on July 10, 2012;

10 WHEREAS, Plaintiffs will file an amendment to the Complaint to add parties
11 whom Plaintiffs contend are additional similarly-situated plaintiffs;

12 WHEREAS, Defendants do not contest Plaintiffs' amendment of the
13 Complaint;

14 WHEREAS, Defendants' consent to Plaintiffs' amendment of the Complaint to
15 add additional plaintiffs is provided in light of the liberal standards for amending
16 pleadings under Rule 15 of the Federal Rules of Civil Procedure and is without
17 waiver of—and is with total reservation of—any of their defenses, arguments, and
18 positions with regard to the Complaint, either as it currently exists or as amended,
19 including but not limited to arguments concerning timeliness and limitations of
20 actions, failure to state a claim, joinder and severance, or any other arguments.
21 Plaintiffs will not argue, and this Stipulation is not to be and cannot be taken to
22 support any argument of purported waiver of any defense positions or arguments.

23 NOW THEREFORE, Plaintiffs and Defendants, through their counsel of
24 record, stipulate to the following:

25 IT IS HEREBY STIPULATED that Defendants consent to Plaintiff's
26 amendment of the Complaint.

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Glaser Weil Fink Jacobs
Howard Avchen & Shapiro LLP

Glaser Weil Fink Jacobs
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1 DATED: July 31, 2012

GLASER WEIL FINK JACOBS
HOWARD AVCHEN & SHAPIRO LLP

3 By: Fred D. Heather
4 FRED D. HEATHER

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6 GIRARDI | KEESE
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8 DATED: July 31, 2012

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11 BETH WILKINSON

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13 MUNGER, TOLLES & OLSON LLP
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15 NATIONAL FOOTBALL LEAGUE
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17 DATED: July 31, 2012

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19 ROBERT L. WISE

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